

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
:
: (Jointly Administered)
:
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: X

**SUPPLEMENTAL INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS REGARDING PLAN CONFIRMATION HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)² hereby submits this *supplement* to its informative motion [Case No. 17-32823, Docket No. 18831] in response to the Court’s Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment [Docket No. 18502] (the “Scheduling Order”) and respectfully states as follows:

1. John Arrastia and Jesus M. Suarez of Genovese Joblove & Battista, P.A., as Special Litigation Counsel, may appear virtually via Zoom on behalf of the Committee at the Pretrial Conference and Confirmation Hearing (as defined in the Scheduling Order), and reserve the right

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

to address, as necessary, the following matters solely to the extent not otherwise addressed by the Committee's counsel from Paul Hastings, LLP³:

(a) *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto*

Rico, et al. [Docket No. 17629];

- i. Statement and Reservation of Rights of Official Committee of Unsecured Creditors Regarding Confirmation of Seventh Amended Title III Joint Plan of Adjustment of Commonwealth of Puerto Rico, et al. [Docket No. 18589]
- ii. Statement and Reservation of Rights of Official Committee of Unsecured Creditors Regarding Proposed Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of Commonwealth of Puerto Rico, et al. [Docket No. 18658];

(b) *The Joint Objection of Underwriter Defendants to Debtors' Motion for an Order*

Approving Disclosure Statement [Dkt. 16987] and related joinder(s) [Dkt. 16993].

(c) Any objections, responses, statements, joinders, or replies to any of the foregoing;
and

(d) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing virtually.

³ Special Litigation Counsel does not intend to present opening argument, cross-examine any declarant, or present live rebuttal testimony at the Confirmation Hearing, but reserves the right to be heard to the extent set forth in this Supplement.

Respectfully submitted this 27th day of October, 2021

/s/ John Arrastia

GENOVESE JOBLOVE & BATTISTA, P.A.

John Arrastia, Esq. (*Pro Hac Vice*)

John H. Genovese, Esq. (*Pro Hac Vice*)

Jesus M. Suarez, Esq. (*Pro Hac Vice*)

Angelo M. Castaldi, Esq. (*Pro Hac Vice*)

100 SE 2nd Street, Suite 4400

Miami, FL 33131

Telephone: (305) 349-2300

jgenovese@gjb-law.cdom

jarrastia@gjb-law.com

jsuarez@gjb-law.com

acastaldi@gjb-law.com

*Special Litigation Counsel to the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via CM/ECF notification upon all parties in interest registered to receive electronic notification on this matter (which is incorporated herein by reference) on October 27, 2021.

/s/ John Arrastia

John Arrastia, Esq.